

1 HANSON BRIDGETT LLP
2 SANDRA L. RAPPAPORT - 172990
3 srappaport@hansonbridgett.com
4 JAHMAL T. DAVIS - 191504
5 jdavis@hansonbridgett.com
6 425 Market Street, 26th Floor
7 San Francisco, CA 94105
8 Telephone: (415) 777-3200
9 Facsimile: (415) 541-9366

10 Attorneys for Defendants
11 AMRAT PATEL, RAMILA PATEL, SBS HOSPITALITY,
12 INC., and SEA CLIFF MOTOR INN

13 MCCORMACK LAW FIRM
14 Bryan J. McCormack
15 bryan@mccormacklawfirm.com
16 120 Montgomery Street, Suite 1600
17 San Francisco, CA 94104
18 Telephone: (415) 440-6662
19 Facsimile: (415) 776-5687

20 Attorney for Plaintiffs
21 FAROOQ KUNDIWALA and ZAREEN KUNDIWALA

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 FAROOQ KUNDIWALA and ZAREEN
11 KUNDIWALA, husband and wife,

No. CV 08-01436 JSW

RULE 26(f) REPORT

Plaintiffs,

v.

12 AMRAT PATEL and RAMILA PATEL,
13 husband and wife, SBS HOSPITALITY,
14 INC., a California corporation, SEA
15 CLIFF MOTOR INN, a partnership,

Defendants.

1 Pursuant to Fed. Rule. Civ. Proc. 26(f), a telephonic conference was held on April
2 25, 2008 and was attended by counsel for Plaintiffs, Bryan McCormick, and counsel for
3 Defendants, Jahmal Davis. The parties now jointly submit this report detailing the meet-
4 and-confer discussions and plan for discovery in compliance with Fed. Rule Civ. Proc.
5 26(f)(2).

6 **DISCOVERY PLAN:** The parties jointly propose to the court the following
7 discovery plan:

8 1. Pre-Discovery Disclosures FRCP 26(f)(3)(A): No changes were made in
9 the timing, form, or requirement for disclosures under Rule 26(a). The parties exchanged
10 the information required by Rule 26(a)(1) on May 29, 2008.

11 2. Scope And Deadlines For Discovery FRCP 26(f)(3)(B):

12 The Parties agree that discovery will be necessary on all subjects related to the
13 allegations and prayer for relief in Plaintiffs' Amended Complaint, as well as the denials,
14 affirmative defenses and prayer in Defendants' Answer. These subjects will include, but
15 not be limited to, Plaintiffs' employment, job duties, job classification, hours worked and
16 compensation while employed at the Sea Cliff Motor Inn. This will also include, but not
17 be limited to, the damages allegedly suffered by Plaintiffs, and the loss of income
18 suffered by Defendants.

19 The Parties further agree that discovery should be completed by January 9, 2009,
20 and should comply with the Federal Rules of Civil Procedure, unless the Parties stipulate
21 or agree to do otherwise.

22 3. Discovery of Electronically Stored Information FRCP 26(f)(3)(C):

23 The Parties do not anticipate any issues regarding the disclosure or discovery of
24 electronically stored information. To the extent that any such discovery is needed, the
25 Parties agree to comply with Federal Rule of Civil Procedure 26(b)(2). Both parties
26 have fulfilled their duties to preserve electronically stored information.

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1 4. Privileged and Protected Material FRCP 26(f)(3)(D):

2 While the parties do not anticipate any issues or disputes regarding the discovery
3 of privileged or protected materials, they agree to identify and assert any such claim to
4 privilege on a privilege log as required pursuant to Federal Rule of Civil Procedure
5 26(b)(5). The parties further agree to use the process provided in Rule 26(b)(5)(B) to
6 address any concerns related to inadvertently disclosed information subject to privilege
7 or privacy.

8 5. No Changes to The Statutory Discovery Limitations FRCP 26(f)(3)(E):

9 No changes were made in the limitations on discovery imposed under Rule 26.

10 6. Expert Discovery FRCP 26(f)(3)(F):

11 The Parties agree that expert discovery will proceed pursuant to Rule 26(a)(2)
12 and that reports from retained experts will be due: December 5, 2008.

13 DATED: July 11, 2008

HANSON BRIDGETT LLP

16 By:/s/ Jahmal T. Davis

17 JAHMAL T. DAVIS
18 SANDRA L. RAPPAPORT
19 Attorneys for Defendants
20 AMRAT PATEL, RAMILA PATEL, SBS
21 HOSPITALITY, INC., and SEA CLIFF
22 MOTOR INN

23 MCCORMACK LAW FIRM

24 DATED: July 11, 2008

27 By:/s/ Bryan J. McCormack

28 BRYAN J. MCCORMACK
26 Attorneys for Plaintiffs
27 FAROOQ KUNDIWALA and ZAREEN
28 KUNDIWALA